AO 91 (Rev 11/11) Criminal Complaint (approved by AUSA Kelly A. Lewis Fallenstein)

# UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America
v.

TAJHAN OMAR KNOX
*Defendant(s)*

Case No. 17-560-m

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 17, 2016 - June 14, 2016 in the county of Northampton in the Eastern District of Pennsylvania, the defendant(s) violated:

| *Code Section* | *Offense Description* |
|---|---|
| 21 U.S.C. § 841(a)(1),(b)(1)(C) | DISTRIBUTION OF HEROIN (6 COUNTS) |
| 21 U.S.C. § 841(a)(1),(b)(1)(C) | POSSESSION OF HEROIN WITH THE INTENT TO DISTRIBUTE |
| 18 U.S.C. § 924(c) | POSSESSION OF A FIREARM IN FURTHERANCE OF DRUG TRAFFICKING |
| 18 U.S.C. § 922(g)(1) | FELON IN POSSESSION OF A FIREARM |
| 18 U.S.C. § 2 | AIDING AND ABETTING (COUNT 2 ONLY) |

This criminal complaint is based on these facts:

See affidavit attached hereto.

☑ Continued on the attached sheet.

*Complainant's signature*

Special Agent William Smith, FBI
*Printed name and title*

Sworn to before me and signed in my presence.

Date: 04/24/2017

*Judge's signature*

City and state: Allentown, Pennsylvania

Hon. Henry S. Perkin, United States Magistrate Judge
*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, William Smith, being duly sworn under oath and deposed, state the following:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") assigned to the Allentown Resident Agency, Pennsylvania (PA) Division. As a result of my training and experience, and that of other investigators, I am familiar with investigations involving violations of Federal narcotics laws, and I am familiar with evidence needed in a criminal complaint affidavit to establish probable cause.

2. The information contained in this affidavit is known to me personally or has been relayed to me by other law enforcement officers, as indicated below. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause to secure authorization to arrest TAJHAN OMAR KNOX, I have not included every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause.

3. This affidavit is being submitted in support of a criminal complaint and arrest warrant charging TAJHAN OMAR KNOX, date of birth (DOB) March 27, 1991, with violations of: Title 21, United States Code, Section 841(a)(1), (b)(1)(C) (distribution of heroin) (six counts); Title 21, United States Code, Section 841(a)(1), (b)(1)(C) (possession of heroin with intent to distribute) (one count); Title 18, United States Code, Section 924(c) (possession of a firearm in furtherance of drug trafficking) (one count); Title 18, United States Code, Section 922(g) (felon in possession of a firearm) (one count); and Title 18 United States Code, Section 2 (aiding and abetting) (count two only).

4. The FBI Allentown Resident Agency conducted a joint criminal investigation with the Pennsylvania State Police (PSP) and the City of Easton Police Department (EPD) into multiple Blood street gang members known to be involved in the illegal enterprise of

narcotics trafficking in the City of Easton, Pennsylvania. TAJHAN OMAR KNOX was an identified Blood street gang member known to law enforcement as a distributor of heroin.

5. On or about March 17, 2015, investigators from the FBI, PSP, and EPD, utilizing a confidential human source (CHS), hereinafter referred to as "CHS-1," conducted a controlled purchase of approximately .61 grams of heroin from KNOX. In summary, CHS-1 conducted a consensually recorded telephone call and exchanged recorded text messages with KNOX at telephone number 484-541-2707, and arranged to purchase heroin from KNOX. CHS-1 arranged to meet KNOX at a designated meeting location in Easton, Pennsylvania in order to purchase the heroin. CHS-1 was provided with $250 in prerecorded money and then he/she drove to the meeting location and KNOX entered CHS-1's vehicle. The heroin transaction took place inside CHS-1's vehicle and was audio and video recorded. The video recording shows CHS-1 give KNOX the prerecorded money and KNOX give CHS-1 five bundles (50 packets) of heroin. The heroin was weighed and chemically tested by the Pennsylvania State Police Bureau of Forensic Services, and the laboratory concluded there was approximately .61 grams of heroin.

6. On or about March 19, 2015, investigators from the FBI, PSP, and EPD, utilizing CHS-1, conducted a controlled purchase of approximately .89 grams of heroin from KNOX. In summary, CHS-1 conducted consensually recorded telephone calls and exchanged recorded text messages with KNOX at telephone number 484-541-2707, and arranged to purchase heroin from KNOX. CHS-1 agreed to meet KNOX at a designated meeting location in Easton, Pennsylvania for the heroin transaction. CHS-1 was provided with

$250 in prerecorded money and then he/she drove to the meeting location and KNOX and white male identified as Justin Cobb entered CHS-1's vehicle. The heroin transaction took place inside CHS-1's vehicle and was audio and video recorded. The video recording shows CHS-1 give KNOX the prerecorded money and KNOX give CHS-1 five bundles (51 packets) of heroin. The heroin was weighed and chemically tested by the Pennsylvania State Police Bureau of Forensic Services, and the laboratory concluded there was approximately .89 grams of heroin.

7. On or about April 24, 2015, investigators from the FBI, PSP, and EPD, utilizing CHS-1, conducted a controlled purchase of approximately .13 grams of heroin from KNOX. In summary, CHS-1 exchanged recorded text messages with KNOX at telephone number 484-541-2707, and arranged to purchase heroin from KNOX. CHS-1 agreed to meet KNOX at a designated meeting location in Easton, Pennsylvania for the heroin transaction. CHS-1 was provided with $250 in prerecorded money and then he/she drove to the meeting location and KNOX entered CHS-1's vehicle. The heroin transaction took place inside CHS-1's vehicle and was audio and video recorded. The video recording shows CHS-1 give KNOX the prerecorded money and KNOX give CHS-1 five bundles (50 packets) of heroin. The heroin was weighed and chemically tested by the Pennsylvania State Police Bureau of Forensic Services, and the laboratory concluded there was approximately .13 grams of heroin.

8. On or about May 14, 2015, investigators from the FBI, PSP, and EPD, utilizing CHS-1, conducted a controlled purchase of approximately .04 grams of heroin from KNOX. In summary, CHS-1 exchanged recorded text messages with KNOX at telephone number 484-541-2707, and arranged to purchase heroin from KNOX. CHS-1 agreed to meet

KNOX at a designated meeting location in Palmer Township, Pennsylvania for the heroin transaction. CHS-1 was provided with $250 in prerecorded money and then he/she drove to the meeting location and KNOX entered CHS-1's vehicle. The heroin transaction took place inside CHS-1's vehicle and was audio and video recorded. The video recording shows CHS-1 give KNOX the prerecorded money and KNOX give CHS-1 five bundles (50 packets) of heroin. The heroin was weighed and chemically tested by the Pennsylvania State Police Bureau of Forensic Services, and the laboratory concluded there was approximately .04 grams of heroin.

9. On or about August 4, 2015, investigators from the FBI, PSP, and EPD utilizing a confidential human source, hereinafter referred to as "CHS-2," conducted a controlled purchase of approximately .019 grams of heroin from KNOX. In summary, CHS-2 had telephone contact with KNOX at telephone number 484-541-2707, and arranged to purchase of a bundle of heroin from KNOX. CHS-2 agreed to meet KNOX at a designated meeting location in Easton, Pennsylvania for the heroin transaction. CHS-2 was provided with $80 in prerecorded money and then he/she went to the meeting location at a parking lot in Easton, where CHS-2 gave KNOX the prerecorded money, and then KNOX and CHS-2 went inside a store (CVS) together and KNOX gave CHS-2 the 13 packets of heroin inside the store. Law enforcement provided surveillance the entire time of the controlled purchase and after the transaction concluded CHS-2 surrendered 13 packets of heroin to law enforcement and advised he/she utilized the prerecorded funds to purchase the heroin from KNOX. The heroin was weighed and chemically tested by the Pennsylvania State Police Bureau of Forensic Services, and the laboratory concluded there was approximately .019 grams of heroin.

10. On or about August 6, 2015, investigators from the FBI, PSP, and EPD, utilizing CHS-2, conducted a controlled purchase of approximately .017 grams of heroin from Tajhan Omar KNOX. In summary, CHS-2 had telephone contact with KNOX at telephone number 484-541-2707, and arranged to purchase of a bundle of heroin from KNOX. CHS-2 agreed to meet KNOX at a designated meeting location in Easton, Pennsylvania for the heroin transaction. CHS-2 was provided with $75 in prerecorded money and then he/she went to the meeting location and KNOX and CHS-2 went inside a store (Dunkin Donuts) together and the heroin transaction took place. Law enforcement provided surveillance the entire time of the controlled purchase and after the transaction concluded CHS-2 surrendered 10 packets of heroin to law enforcement and advised he/she utilized the prerecorded funds to purchase the heroin from KNOX. The heroin was weighed and chemically tested by the Pennsylvania State Police Bureau of Forensic Services, and the laboratory concluded there was approximately .017 grams of heroin.

11. On June 14, 2016, investigators from the FBI, PSP, and EPD executed a search warrant at 149 South 12th Street, Easton, Northampton County, Pennsylvania as part of the drug trafficking investigation into KNOX and others known to be living and distributing controlled substances out of that residence.

12. KNOX resided in the rear bedroom of the residence with his girlfriend, and his personal affects were located in that bedroom including his high school diploma and unrelated court payment documents.

13. Upon searching the rear bedroom law enforcement seized and recovered the following items: loose heroin; 12 packages of heroin; three cellphones; three sifters; two boxes containing new heroin bags; three empty heroin bag boxes; one box containing small

rubber bands; an empty box of rubber gloves; two small plastic spoons; a notebook page containing handwritten notes of heroin prices and quantities; and a duffel bag that contained four stolen firearms, all manufactured outside the Commonwealth of Pennsylvania, specifically:

a. Smith and Wesson .45 caliber revolver, bearing serial number N677832 loaded with 5-rounds of ammunition;

b. Rossi/Taurus .357 revolver, bearing serial number AV543060 loaded with 6-rounds of ammunition ;

c. Colt .45 caliber semi-automatic pistol; bearing serial number FN36735 loaded with 6-rounds;

d. Springfield Armory .45 caliber semi-automatic pistol, bearing serial number NM53398 loaded with 7-rounds of ammunition.

14. The loose and packaged heroin located in the rear bedroom was weighed and chemically tested by the Pennsylvania State Police Bureau of Forensic Services, and the laboratory concluded there was approximately 1.32 grams of heroin.

15. KNOX has two felony convictions in his criminal history. KNOX has one felony conviction for possession of a controlled substance with the intent to deliver ("PWID") from Northampton County, Pennsylvania, from December 9, 2011. KNOX also has a felony conviction for conspiracy to commit robbery from Northampton County, from July 7, 2009. These prior felony convictions prohibit KNOX from possessing a firearm.

16. Because of the aforementioned facts, your affiant believes there is probable cause to charge TAJHAN OMAR KNOX with violations of: Title 21, United States Code, Section 841(a)(1), (b)(1)(C) (distribution of heroin) (six counts); Title 21, United States Code,

Section 841(a)(1), (b)(1)(C) (possession of heroin with intent to distribute) (one count); Title 18, United States Code, Section 924(c) (possession of a firearm in furtherance of drug trafficking) (one count); Title 18, United States Code, Section 922(g) (felon in possession of a firearm) (one count); and Title 18 United States Code, Section 2 (aiding and abetting) (count two only).

WILLIAM SMITH
Special Agent
Federal Bureau of Investigation

Sworn to before me
this 21 day of April 2017

HONORABLE HENRY S. PERKIN
*United States Magistrate Judge*